

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

In re: EASTERN LIVESTOCK CO., LLC,)	Chapter 11
)	
Debtor.)	Case No. 10-93904-BHL-11
)	
In re: OKIE FARMS, L.L.C.,)	Chapter 11
)	
Debtor.)	Case No. 11-93144-BHL-11

MOTION FOR JOINT ADMINISTRATION

James A. Knauer as chapter 11 trustee (the "Trustee") for Eastern Livestock Co., LLC ("ELC") and Okie Farms, L.L.C. ("Okie"; ELC and Okie are collectively referred to as the "Debtors"), hereby file this motion (the "Joint Administration Motion") for entry of an order directing the joint administration of their respective chapter 11 cases (the "Chapter 11 Cases") pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules") and Rule B-1015-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of Indiana (the "Local Bankruptcy Rules") under ELC's chapter 11 case.

JURISDICTION

1. Certain petitioning creditors commenced ELC's Chapter 11 case ("ELC Chapter 11 Case") against ELC on December 6, 2010 ("ELC Petition Date") by filing an involuntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. ("Bankruptcy Code") with the United States Bankruptcy Court for the Southern District of Indiana, New Albany Division ("Court"). This Court entered the *Order For Relief In An Involuntary Case And Order To Complete Filing* [Docket #110] on December 28, 2010.

2. On December 27, 2010, the Court entered the *Order Approving The Appointment Of James A. Knauer As Chapter 11 Trustee* [Docket #102], approving the United

States Trustee's *Notice Of Appointment And Application For Order Approving Appointment of Trustee* [Docket #98] pursuant to 11 U.S.C. § 1104.

3. On December 8, 2011, Okie filed with the Court its voluntary petition for relief under Chapter 11 of the Bankruptcy Code commencing its Chapter 11 case ("Okie Chapter 11 Case").

4. No trustee or examiner has been appointed in the Okie Chapter 11 Case and Okie continues to operate its business and manage its properties as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

5. This Court has jurisdiction to consider the Joint Administration Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

6. The statutory bases for the relief sought herein are Bankruptcy Rule 1015(b) and Local Bankruptcy Rule B-1015-1.

RELIEF REQUESTED

A. Summary of Relief

7. By the Joint Administration Motion, the Debtors seek entry of an order authorizing the joint administration of the ELC Chapter 11 Case with the Okie Chapter 11 Case under the case number assigned to ELC (10-93904-BHL-11) pursuant to Local Bankruptcy Rule B-1015-1(b)(1). The Debtors request that the caption of the Chapter 11 Cases be modified to reflect the joint administration of the Chapter 11 Cases as follows:

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

In re:)	Chapter 11
)	
EASTERN LIVESTOCK CO., LLC, et al., ¹)	Case No. 10-93904-BHL-11
)	
Debtors.)	JOINTLY ADMINISTERED

B. Basis for Relief

8. In order to administer the Chapter 11 Cases optimally and economically, such cases should be jointly administered under the case number assigned to ELC. Joint procedural administration of related chapter 11 cases is allowed pursuant to Bankruptcy Rule 1015(b) and Local Bankruptcy Rule B-1015-1. The relief sought in the Joint Administration Motion is for procedural administration only.

9. Bankruptcy Rule 1015(b) provides, "If a joint petition or two or more petitions are pending in the same court by or against . . . [(4) a debtor and an affiliate, the court may order a joint administration of the estates]. Prior to entering an order the court shall give consideration to protecting creditors of different estates against potential conflicts of interest."

10. The rights of the Debtors' respective creditors will not be adversely affected by the joint administration of the Chapter 11 Cases. ELC is the sole member of Okie. Okie's only asset is its ownership interests in Cattlemen's Feedlot, Ltd. and Cattlemen's Feedlot Management Company, LLC (the "Ownership Interests"). Debtors are seeking authority to sell the Ownership Interests, which sale proceeds will be the sole asset of Okie's estate. The sale will jointly affect both Debtors. As a result, joint administration of the Chapter 11 Cases will serve the interests of judicial economy and save expense for all.

¹ The Debtor entities are Eastern Livestock Co., LLC and Okie Farms, L.L.C.

11. Because ELC is the only creditor of Okie, joint administration of the Chapter 11 Cases will not harm any creditors.

12. Because upcoming hearings and noticing related thereto will be more efficient and less costly if the Chapter 11 Cases are jointly administered and because no parties in interest will be harmed thereby, the Court has authority to and should order the joint administration of the Chapter 11 Cases.

WHEREFORE, the Trustee and Okie respectfully request that the Court enter an Order (a) authorizing the joint administration of the ELC Chapter 11 Case with the Okie Chapter 11 Case under the case number assigned to ELC, and (b) granting other proper relief.

Respectfully submitted,

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By: /s/ Dustin R. DeNeal

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CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2011, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on December 8, 2011, a copy of the foregoing pleading was served via electronic mail transmission on the following:

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